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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Z.B., a minor, and J.B., a minor, by
their guardian, S.S., and S.S., an
individual,

Plaintiffs,

vs.

DELTA AIR LINES, INC.;
BRIAN PATRICK DURNING;
and DOES 1 through 5, inclusive,
Defendants.

Case No. 2:24-cv-02178-FLA-DFM

**PLAINTIFFS' DISCLOSURE
STATEMENT**

1 In compliance with Federal Rule of Civil Procedure 7.1¹, the undersigned counsel
2 of record for Plaintiffs Z.B., a minor, and J.B., a minor, by their guardian, S.S., and S.S.,
3 hereby names and identifies the citizenship of the following individuals whose
4 citizenship are attributed to Plaintiffs:

- 5 • Plaintiff Z.B., a minor child of S.S., resides in and is a citizen of Los
6 Angeles County, California.;
- 7 • Plaintiff J.B., a minor child of S.S., resides in and is a citizen of Los
8 Angeles County, California
- 9 • Plaintiff S.S. is an individual who resides in and is a citizen of Los Angeles
10 County, California.

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12 Dated: March 25, 2024

Respectfully submitted,
LEWIS BAACH KAUFMANN
MIDDLEMISS PLLC

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15 By: /s/ Jessica Buckwalter
Jessica R. Lobis Buckwalter (SBN 199200)
16 Adam Kaufmann (*pro hac vice* pending)
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19 By: /s/ Karen Agnifilo
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22 By: /s/ José-Manuel A. de Castro
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24 *Attorneys for Plaintiffs*

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27 ¹ Filing this Disclosure Statement shall not be construed as a waiver or as conceding
28 diversity jurisdiction. Plaintiffs deny that diversity jurisdiction exists in this matter.
They expressly reserve any and all rights available to them to contest diversity
jurisdiction, including the right to file a motion to remand this case back to the Superior
Court of the State of California for the County of Los Angeles.

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